

Message Text

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44

ACTION TRSE-00

INFO OCT-01 ARA-10 ISO-00 L-03 EB-07 SP-02 CIAE-00 INR-07

NSAE-00 /030 W

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R 111259Z AUG 75

FM AMEMBASSY BRASILIA

TO SECSTATE WASHDC 0856

INFO AMCONSUL RIO DE JANEIRO

AMCONSUL SAO PAULO

UNCLAS BRASILIA 6662

PASS TREASURY

E.O. 11652: N/A

TAGS: EFIN; BR

SUBJ: BILATERAL TAX TREATY

REF: STATE 281288, DECEMBER 26, 1974

1. FOLLOWING IS AN UNOFFICIAL TRANSLATION OF A NOTE THE EMBASSY HAS RECEIVED FROM THE MINISTRY OF EXTERNAL RELATIONS IN REPLY TO THE EMBASSY'S NOTE (REFTEL) EXPRESSING THE DESIRE OF THE US GOVERNMENT IN BEGINNING PRELIMINARY DISCUSSIONS ON A BILATERAL TAX TREATY:

2. QUOTE. THE MINISTRY OF EXTERNAL RELATIONS COMPLIMENTS THE EMBASSY OF THE UNITED STATES OF AMERICA AND HAS THE HONOR TO ACKNOWLEDGE RECEIPT OF NOTE NO. 40, OF JANUARY 28, 1975, EXPRESSING THE DESIRE OF THE UNITED STATES GOVERNMENT TO INITIATE PRELIMINARY CONVERSATIONS ON A BILATERAL TREATY DESIGNED TO AVOID DOUBLE TAXATION OF INCOME BETWEEN THE GOVERNMENTS OF BRAZIL AND THE UNITED STATES.

2. ON THIS OCCASION, THE MINISTRY OF EXTERNAL RELATIONS INFORMS THE EMBASSY OF THE UNITED STATES OF AMERICA THAT THE COMPETENT BRAZILIAN AUTHORITIES, HAVING UNCLASSIFIED

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BEEN CONSULTED IN THIS REGARD, HAVE MANIFESTED THEMSELVES

FAVORABLE TO THE EMBASSY'S PROPOSAL, JUDGING OPPORTUNE THE REALIZATION OF PRELIMINARY CONVERSATIONS WITH THE UNITED STATES GOVERNMENT TO OBTAIN THE DATA WITH RESPECT TO U.S. TAX LEGISLATION, WITH THE OBJECTIVE OF THE EVENTUAL NEGOTIAION OF A TREATY TO AVOID DOUBLE TAXATION IN THE AREA OF INCOME TAX. END QUOTE.

3. COMMENT: FRANCISCO DORNELLES FROM THE FINANCE MINISTRY HAS TOLD FINATT THAT THIS STAFF HAS ABOUT COMPLETED THE REVIEW OF THE DRAFT TREATY SUBMITTED BY TREASURY. HE HOPES THAT ONCE THE REVIEW IS COMPLETED A DATE CAN BE SET TO BEGIN PRELIMINARY DISCUSSIONS. THIS TIME SCHEDULE WAS CONFIRMED IN A RECENT LETTER FROM FINANCE MINISTER SIMONSEN TO THE AMBASSADOR (A COPY OF WHICH IS BEING FORWARDED TO NATHAN GORDON AT TREASURY).
CRIMMINS

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